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Attorneys for Defendant/Counter-Claimant

Swisstrax Corporation

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SNAP LOCK INDUSTRIES, INC. a Utah
corporation,

Plaintiff/Counter-Defendant,

vs.

SWISSTRAX CORPORATION., a California
corporation,

Defendant/Counter-Claimant

SWISSTRAX CORPORATION,
a California corporation,

Counter Claimant,

vs.

SNAP LOCK INDUSTRIES, INC.,
a Utah corporation,

Counter Defendant.

Case No: 2:17-cv-02742-RFB-BNW

**STIPULATION AND ORDER FOR
ADDITIONAL TIME TO FILE
RESPONSES TO MOTIONS (ECF Nos.
329, 331, 333, 334, 336, and 337)**

(First Request)

1 Defendant Swisstrax Corporation (“Swisstrax”) and Plaintiff Snap Lock Industries, Inc.
2 (“Snap Lock”) (collectively, “Parties”), through their undersigned counsel, hereby respectfully
3 jointly submit this Stipulation regarding Motion papers, and state as follows:

4 1. Between May 18, 2021 and May 21, 2021, Snap Lock filed six motions. (“Filed
5 Motions”).

6 2. On May 18, 2021, Snap Lock filed a Motion to Dismiss for Lack of Standing
7 Sufficient to Establish Subject Matter Jurisdiction (ECF No. 329) and a Motion to Seal (ECF No.
8 331).

9 3. On May 19, 2021, Snap Lock filed a Motion to Exclude Expert Testimony of
10 Gregory A. Pinsonneault (ECF No. 333) and a Motion to Seal (ECF No. 334).

11 4. On May 21, 2021, Snap Lock filed a Motion to Revisit Summary Judgment Re
12 No Secondary Meaning of Swisstrax’s Alleged Diamondtread Mark (ECF No. 336) and a
13 Motion to Seal (ECF No. 337).

14 5. No hearings have been set for the Filed Motions.

15 6. On May 24, 2021, the Parties filed a Stipulation and Proposed Order to Extend
16 Time to File Joint Pretrial Order. The Parties are diligently working to complete the voluminous
17 information to be addressed in the Joint Pretrial Order by the Friday, May 28, 2021 deadline.

18 7. The Monday following the Joint Pretrial Order deadline, May 31, 2021, is the
19 Memorial Day Holiday.

20 8. As such, the Parties have agreed to extend the deadline by which Swisstrax needs
21 to respond to each of the Filed Motions by an additional two (2) weeks, and allow Snap Lock
22 two (2) weeks to respond on each of the reply briefs, if any.

23 IT IS STIPULATED that Swisstrax’s response to ECF Nos. 329 and 331 will be due on
24 or before June 15, 2021;

25 IT IS STIPULATED that Swisstrax’s response to ECF Nos. 333 and 334 will be due on
26 or before June 16, 2021;

27 IT IS STIPULATED that Swisstrax’s response to ECF Nos. 336 and 337 will be due on
28 or before June 18, 2021;

1 IT IS STIPULATED that Snap Lock's replies to ECF Nos. 329 and 331 will be due on or
2 before June 29, 2021;

3 IT IS STIPULATED that Swisstrax's response to ECF Nos. 333 and 334 will be due on
4 or before June 30, 2021;

5 IT IS STIPULATED that Snap Lock's replies to ECF Nos. 336 and 337 will be due on or
6 before July 2, 2021;

7 This is the first request to extend these deadlines and is not brought for purposes of undue
8 delay.

9 Dated this 28th day of May 2021.

10 DICKINSON WRIGHT PLLC

DORSEY & WHITNEY LLP

11 /s/ John L. Krieger

/s/ Tamara L. Kapaloski

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17 **ORDER**

18 **IT IS SO ORDERED:**

19 

20 The Hon. Brenda Weksler

United States Magistrate Judge

21 DATED: June 8, 2021

22 _____